

Beth Maxwell Stratton
Chapter 7 Trustee
Post Office Box 3930
Pinedale, CA 93650
Telephone: (559) 441-4233
Facsimile: (559) 441-4234

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

In re:
ARMEN & MARINA PETROSYAN,
Debtors.

Case No. 10-12877-B-7F

Chapter 7

DC No. BMS-2

**MOTION TO SELL PROPERTY
OUT OF THE ORDINARY COURSE
OF BUSINESS AT PUBLIC
AUCTION**

Date: September 15, 2010
Time: 10:00 a.m.
Dept: B, Hon. W. Richard Lee

TO THE HONORABLE W. RICHARD LEE, UNITED STATES BANKRUPTCY JUDGE:

Beth Maxwell Stratton, Chapter 7 Trustee, respectfully represents:

1. She is the duly appointed, qualified and acting trustee of the above-entitled estate.
2. The above-captioned case was filed under Chapter 7 on March 19, 2010.
3. This Court has jurisdiction over this proceeding by virtue of 28 U.S.C. §1334(a). This is a "core" proceeding pursuant to 28 U.S.C. §157(b)(2)(A), (N). This motion is brought pursuant to 11 U.S.C. §363.
4. The assets of the estate include a 1964 Ford Thunderbird ("T-Bird").
5. The Trustee wishes to sell the subject T-Bird so that the proceeds can be used.

1 to benefit the estate. Trustee has elected to sell the T-Bird by means of public auction to be
2 held on or after Tuesday, September 21, 2010, at Baird Auctions and Appraisals located at
3 1328 North Sierra Vista, Suite B, Fresno, California.

4 6. Trustee has previously filed an application for authority to employ Baird
5 Auctions and Appraisals ("Auctioneer"), and the employment was approved by the Court on
6 August 2, 2010.

7 7. Auctioneer routinely holds regularly scheduled, and advertised, auctions on
8 Tuesday nights. Auctioneer's compensation shall be 15% of the sale price of the property,
9 plus a 10% buyer's premium which is not taken from the sales proceeds. Auctioneer shall
10 also charge storage fees of \$2.00 per day for the vehicle.

11 8. Trustee believes that such auction is in the best interest of the creditors.

12 WHEREFORE, Trustee prays that she be authorized to sell the T-Bird at public
13 auction, and to pay the auctioneer 15% of the sales price plus reasonable and necessary
14 storage fees.

15
16 Dated: August 7, 2010

A handwritten signature in black ink, appearing to read 'Beth Maxwell Stratton', is written over a horizontal line. The signature is stylized with large loops and a trailing flourish.

Beth Maxwell Stratton, Chapter 7 Trustee